

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**JOSEPH FRIEL**, individually and on  
behalf of a class of all persons and  
entities similarly situated,

Plaintiff,

v.

**LINE 5, LLC; HEADSTART  
WARRANTY GROUP LLC; and JEA  
MANAGEMENT SERVICES d/b/a  
COVERED AUTO,**

Defendants.

**Case No. 3:24-cv-01866-JKM**

**{Judge Julia K. Munley}**

**DEFENDANT HEADSTART WARRANTY GROUP, LLC'S CONSENT  
MOTION FOR AN EXTENSION OF TIME TO FILE ITS RESPONSE TO  
PLAINTIFF'S COMPLAINT**

Defendant Headstart Warranty Group, LLC ("Headstart") respectfully requests, with the consent of Plaintiff, that the Court grant an extension of time to file its response to Plaintiff's Complaint, ECF 1, and, in support thereof, states as follows:

1. On or about October 29, 2024, Plaintiff filed his Complaint See ECF 1.
2. Headstart was served with the Complaint on or about October 31, 2024. See ECF 7.

3. Headstart's Response to Plaintiff's Complaint is currently due on November 20, 2024.

4. The undersigned counsel was retained by Headstart on Tuesday, November 19, 2024.

5. The undersigned respectfully requests an extension of time, up to and including, December 13, 2024, to file Headstart's response to Plaintiff's Complaint.

6. Defendant, Headstart, has not previously sought an extension for time to respond to Plaintiff's Complaint.

7. Plaintiff's Counsel consented to this Motion on November 15, 2024 during a phone conversation with Barry S. Guaglardi, Esq., who will serve as co-counsel for the undersigned and who will be filing for special admission, pro hac vice, in short order.

8. This Motion is made in good faith and not for the purpose of delay.

9. This Motion is made without waiving any defenses.

WHEREFORE, Defendant Headstart Warranty Group, LLC requests an extension, up to and including, December 13, 2024, to file its Answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

**MESSER STRICKLER BURNETTE, LTD**

/s/ Andrew M. Schwartz

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*Counsel for Defendant*  
*Headstart Warranty Group, LLC*

**SO ORDERED**, Defendant Headstart Warranty Group, LLC, deadline to respond to the complaint is extended until December 13, 2024.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Julia K Munley

**CERTIFICATE OF SERVICE**

I certify that on November 19, 2024, a true copy of the foregoing Motion was served on all counsel of record by ECF.

Respectfully submitted,

**MESSER STRICKLER BURNETTE, LTD**

/s/ Andrew M. Schwartz

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*Counsel for Defendant*  
*Headstart Warranty Group, LLC*